

## **REMARKS**

Applicant and the undersigned thank Examiner Tsay for his careful review of this application. Reconsideration of the present application in light of the above-amendments to the claims and in view of the following remarks is respectfully requested.

By the present communication, claims 1, 4, 7, 8, 12, 16 and 18 have been amended; claims 2, 5, 9-10, 13 and 19-40 have been presented in their original form; claims 41-55 have been added; and claims 3, 6, 11, 14, 15 and 17 have been cancelled. Thus, claims 1-2, 4-5, 7-10, 12-13, 16 and 18-55 are currently pending and under active prosecution in the present application. Allowance of all claims is respectfully requested.

Applicants and the undersigned gratefully acknowledge that claim 11 has been indicated as allowable, and that claims 6, 8, 9, 15, 17, and 18 have been indicated as allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

Applicants note that claims 19-40 have not been explicitly objected to or rejected. Thus, Applicants presume and gratefully acknowledge these claims are allowable in their original form.

## **CLAIM AMENDMENTS**

Claim 1 has been amended to include the limitations previously found in claims 3 and 6. Claim 12 has been amended to include the limitations previously found in claims 14 and 15. Claim 16 has been amended to include the limitation previously found in claim 17. Claims 4, 7 and 8 have been amended to correct dependencies based upon the amendments of claim 1 and claim 16. As amended claim 1, 12 and 16 have been acknowledged by the Examiner as allowable.

New claims 41-55 have been added. Claim 41 incorporates the features of original claims 1, 3 and 8, and has been acknowledged as allowable by the Examiner,

as presented. Claim 48 incorporates the features of original claims 1 and 9, and has been acknowledged as allowable by the Examiner. Dependent claims 42-47 and 49-55 are supported by the specification and claims, as originally filed. Allowance of all claims is respectfully requested.

#### **REJECTION UNDER 35 USC §102(b)**

Applicants respectfully traverse the rejection of claims 1-5, 7, 10 and 12-14 and 16 under 35 USC §102(b), as allegedly anticipated by U.S. Pat. No. 5,791,409 (hereinafter "Flanders"), for at least the following reasons.

The rejection of claim 1 is moot in view of the present claim amendment, which has been acknowledged by the Examiner as allowable. Rejection of claim 3 is moot in view of the cancellation of the claim. Claims 2, 4-5 and 7 are allowable as depending from claim 1. Withdrawal of the rejection and allowance of claims 1-2, 4-5 and 7 are respectfully requested.

With respect to claim 10, the Flanders reference does not teach every element of claim, as originally presented, and thus does not anticipate the claim. Specifically, the Flanders references does not teach a casing cutting tool which includes at least the following:

- (A) an upper cam assembly having a tubular base and a plurality of cam arms extending from the tubular base in a downward longitudinal direction;
- (B) lower cam assembly having a tubular base and a plurality of cam arms extending from the tubular base in an upward longitudinal direction; and
- (C) a plurality of lower non-cutting segments interleaved with the cam arms of the lower cam assembly and the upper cutting segments

Thus, because Flanders does not teach all of the elements of claim 10, withdrawal of the rejection and allowance of the claim is respectfully requested.

The rejection of claim 12 is moot in view of the present amendment to the claim, which has been acknowledged by the Examiner as allowable. Claim 13 is allowable as

depending from claim 12. Rejection of claim 14 is moot in view of the cancellation of the claim. Withdrawal of the rejection of claims 12 and 13 and allowance of the claims are respectfully requested.

The rejection of claim 16 is moot in view of the present amendment to the claim, which has been acknowledged by the Examiner as allowable. Claim 18 is allowable as depending from claim 16, which, as amended, has been indicated as allowable. Rejection of claim 17 is moot in view of the cancellation of the claim. Withdrawal of the rejection of claims 16 and 18 and allowance of the claims are respectfully requested.

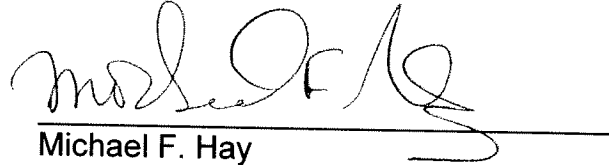
### **CONCLUSION**

The foregoing is submitted as a full and complete Response to the Non-Final Office Action mailed May 10, 2007. Applicants have made a diligent effort to advance the prosecution of the application by submitting claim amendments and arguments in support of patentability of claims. Applicant has not acquiesced to any rejection and reserves the right to address the patentability of any additional claim features in the future. Reconsideration allowance of claims 1-2, 4-5, 7-10, 12-13 and 16-55 is respectfully requested.

As the three-month statutory period for reply expires on August 10, 2007, this Response is therefore considered timely filed and no fees are believed to be due. However, should the Commissioner deem any fees as being due, including any fees for any extensions of time, the Commissioner is hereby authorized to debit said fees from, or to credit any overpayments to, USPTO Deposit Account Number 50-3786, Reference No. 14147.105112.

The Examiner is invited to contact the undersigned via telephone at the number listed below if a telephone conference would expedite or aid the prosecution and examination of this application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael F. Hay", written over a horizontal line.

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